REMARKS

Initially, Applicants note that the Final Office Action again does not acknowledge Applicants' claim for foreign priority under 35 U.S.C. §119, or receipt of a certified copy of the priority document upon which Applicants' claim for foreign priority is based. In this regard, Applicants filed a formal Claim of Priority along with a certified copy of Korean Patent Application No. 10-2002-0061855 on October 7, 2003. Accordingly, with the next Office Action, Applicants again request that the Examiner acknowledge Applicants' claim for foreign priority under 35 U.S.C. §119, as well as receipt of the certified copy of the priority document upon which Applicants' claim for foreign priority is based.

In the outstanding Final Office Action, claims 10-23 were rejected under 35 U.S.C. §103(a) over ISHIKAWA et al. (U.S. Patent No. 6,963,925) in view of CHIU (U.S. Patent No. 6,647,402). Claim 24 was rejected under 35 U.S.C. §103(a) over ISHIKAWA in view of CHIU, and further in view of GAUCHER (U.S. Patent No. 6,175,860). Applicants traverse each of the outstanding rejections.

In relation to the rejection of independent claims 10, 16 and 20, the outstanding Final Office Action asserts that a gateway in ISHIKAWA (e.g., gateway apparatus 903 in Figure 9 or gateway apparatus 2103 in Figure 21) discloses the home server appliance recited in the pending claims. However, the only discussion of a gateway operating as a server in ISHIKAWA is with respect to the embodiment shown in Figures 21-26 therein.

That is, ISHIKAWA does not disclose a home server appliance with any of the features recited in claims 10, 16 and 20. In this regard, ISHIKAWA discloses, at column 14, lines 46-61:

> *FIG. 26 shows an example of the definition information (a program code in this case) produced from the DDI information shown in FIG. 25, and the example shown describes only the part that handles a GUI manipulating event. When "PLAY" button is depressed as the GUI manipulating event, a method called CallDDi() of* ***a server in the GW apparatus*** *is transmitted*

to the HAVi device to be manipulated (target HAVi device) together with the identifier of the GUI component (Element ID shown in FIG. 25). FIG. 24 shows an example where the components in FIG. 25 are developed on a GUI panel. In this example, components of panel and button are produced using Label text information that is essential attribution to the DDI Element. The Element ID is an identifier of the GUI component allotted by the target HAVi device, and the target device recognizes which component is manipulated with this ID (emphasis added).

Further, with respect to a virtual device 2111 sending a method of a protocol to a target HAVi device 2101 at step 2306, ISHIKAWA discloses, at column 15, lines 15-21, that the HAVi device 2101 receives the command, operates as specified, and notifies a change of status when necessary at step 2307, such that:

> ***The server interprets this reply and, if necessary, transfers it to IP device 2105****. After this, every time IP device 2105 is manipulated by the GUI, the process from step 2304 to step 2307 is repeated* (emphasis added).

As described from column 13, line 57 to column 15, line 33, the embodiment shown in Figures 21-26 in ISHIKAWA is directed to enabling a Data Driven Interaction (DDI) compatible HAVi device 2101 to be controlled by an IP device 2105 using a GUI generated by a UI converter 2117. Thus, the only disclosure in ISHIKAWA of a gateway operating as a server relates to an unspecified server in the gateway apparatus 2103 transmitting a method to the HAVi device 2101, and then receiving a reply from the HAVi device 2101 and transferring the reply to the IP device 2105 if necessary.

As set forth above, any server disclosed with respect to a gateway apparatus 2103 is not disclosed in relation to any teaching of addressing an HAVi device 2101 or an IP device 2105. That is, even if generating a pseudo address in ISHIKAWA was properly considered as generically disclosing generating and assigning an identification as in the pending claims, ISHIKAWA does not disclose a home server appliance that generates the pseudo address or the related features. In other words, any server disclosed with respect to a gateway apparatus 2103 is wholly unrelated to the home server appliance recited in claim 10, and the characterization of the entirety of the gateway apparatus 2103 in ISHIKAWA as such a server is improper when ISHIKAWA i.) specifies that a server is only one of the (numerous) disclosed components in the gateway apparatus 2103 and ii.) specifies that all features relating to addressing are performed by other of the numerous disclosed components in the gateway apparatus 2103, and not any server.

In any event, the cited portion of the Abstract of ISHIKAWA does not disclose that the pseudo-address generator of the gateway apparatus 2103 generates an address for a client appliance. Rather, the cited portion of the Abstract of ISHIKAWA discloses that the pseudo address is generated for a virtual device, which as seen in Figures 1, 9, 14, 17 and 21, is a component of the gateway apparatus itself. Accordingly, even if the gateway apparatus 2103 were properly interpreted as disclosing a generic home server appliance, the gateway apparatus 2103 does not generate identifications for client appliances even according to the cited Abstract.

Further, even the pseudo address in ISHIKAWA is not disclosed as a "random" number. In this regard, ISHIKAWA discloses, at column 6, lines 33-44, that a HAVi pseudo address is generated by supplementing a device global unique ID (GUID) with a smallest positive integer not already in use for an SW-Handle, as follows:

> *Here, the SwHandle is calculated as follows:*
> *1) Acquire pseudo addresses already used from the Address correspondence controller.*
> *2) Then take the last 16 bit from each pseudo address acquired. They are SW-Handles already used.*
> *3)* ***Select the smallest positive integer excluding "SW-Handle"s reserved for HAVi system components and SW-Handles took out in 2) above.***
> *4) HAVi pseudo address is generated by putting a device's own GUID on the first 64 bit and the "SW-Handle" on the last 16 bit selected in 3) above in HAVi address format as shown in FIG. 3* (emphasis added).

Moreover, ISHIKAWA discloses that HAVi devices are already assigned a global unique ID (GUID), such that there is no reason for the gateway apparatus 2103 to generate a distinguishing ID for such HAVi devices. In this regard, ISHIKAWA discloses, at column 4, line 65 to column 5, line 14:

> *An address structure of HAVi is described with reference to FIG. 3.* ***HAVi address 301 comprises the following elements: identifier (ID) 302 assigned to respective HAVi devices****; and ID 303 assigned for distinguishing HAVi software elements in the devices, and ID 303 is thus called a software element ID (SEID). The HAVi software element communicates with other software elements using the SEID.* ***ID 302 assigned to an HAVi device is called a global unique ID (GUID) and is a 64-bit identifier specified by the global identifier (EU164) defined by IEEE****. A Sw-Handle assigned for distinguishing a software element in a device is a 16-bit identifier. The SEID thus forms an 80-bit stream. In this first embodiment, the SEID of a combined GUID with Sw-Handle is described "GUID-Sw-Handle" in order to avoid a long description* (emphasis added).

Thus, not only does ISHIKAWA not disclose that the gateway apparatus generates a random number, but there would not be any circumstance where client appliances in ISHIKAWA would need to be assigned a unique ID by the gateway apparatus due to two client appliances having equal identifications.

Accordingly, the cited portions of ISHIKAWA do not disclose that any home server appliance assigns addresses to client appliances, that any client appliances are assigned addresses by any component of a gateway apparatus let alone a home server appliance, that even the cited pseudo addresses are based on a "random" number, or that any client appliance would face a problem due to two client appliances having equal identifications.

Further, the cited reason to apply CHIU to ISHIKAWA is incorrect, insofar as the above-noted teachings of ISHIKAWA disclose that a gateway apparatus assigns a pseudo address only to a virtual device which is a component of the gateway apparatus, and that client devices are already assigned global unique identifications such that no two client device identifications would ever be equal. As described above, the circumstances by which a random number is assigned as an identification of a client appliance, according to the invention to which the pending claims are directed, are not circumstances which would be presented in any scenario according to ISHIKAWA. Therefore, ISHIKAWA does not call for modification with the features of the invention to which the pending claims are directed, let alone the numerous modifications which would be necessary to obtain the claimed combinations. Accordingly, it would not be obvious to modify ISHIKAWA with teachings of CHIU or any other document to obtain the combination recited in pending independent claims 10, 16 or 20.

As set forth above, ISHIKAWA in view of CHIU does not disclose, suggest or render obvious the home server appliance recited in independent claim 10, the method performed by the home server appliance recited in independent claim 20, or the associated first client appliance recited in independent claim 16. Accordingly, independent claims 10, 16 and 20 are allowable over ISHIKAWA in view of CHIU. Claims 11-15, 17-19 and 21-24 are allowable at least for depending, directly or indirectly, from an allowable independent claim as well as for additional reasons related to their own recitations. Therefore, Applicants respectfully request reconsideration and withdrawal of each of the outstanding rejections.

Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully Submitted,
Young Hoon ROH et al.

Joshua M. Povsner
Reg. #42,086

Bruce H. Bernstein
Reg. No. 29,027

September 20, 2007
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191
(703) 716-1191